

SOCIAL JUSTICE AND REGENERATION COMMITTEE'S POLICY REVIEW

HOUSING FOR OLDER PEOPLE

EVIDENCE FROM THE WELSH LOCAL GOVERNMENT ASSOCIATION

1. This Association has, as the enclosed publications demonstrate, consistently made the case over the past 3 years for a public debate about the strategic direction and priorities for meeting older people's housing needs. We therefore very much welcomed the Assembly government's commitment in the Strategy for Older People, published last January, to lead such a national debate on priorities and strategies.

2. The new Social Justice and Regeneration Committee is to be congratulated on giving this issue such high priority in its work programme so early in the new administration and we welcome the opportunity to contribute to the Committee's thinking, through the current consultation and evidence gathering. The Committee has a significant role to play in :
 - scrutinising and shaping the implementation of the broad range of Assembly government policies which can lead to better housing options for older people;

 - encouraging links to be made across all relevant Assembly programmes and fostering joint working particularly with the Local Government Committee and the Health and Social Services Committees on these issues;

 - contributing to a more informed debate about priorities and strategies for meeting older people's needs as well as increasing the level and quality of that debate .

1. The following publications are enclosed with this briefing, with which some Committee Members will already be familiar :
 - The future of Sheltered Housing – report for the Older People's Advisory Group published January 2002

 - The Welsh Local Government Association's Housing Manifesto, published in January 2003 in advance of the National Assembly elections

The Policy Context

1. There are, undoubtedly, specific issues affecting older people's access to appropriate

housing as they age and get less able. There is a risk, however, because vulnerability, disability and the need for support and care tend to increase the older we get that "older people's housing" needs become defined as the need for dwellings designed or adapted for older people or which included accommodation-based packages of care or support. In reality, the overwhelming majority of older people remain living independently at home throughout their lives without requiring care services. It is therefore essential that priorities for housing policy and investment should reflect the needs of these older people as well as those requiring care or regular support services. Older people are as affected as other owner occupiers and tenants by the general problems besetting the Welsh housing stock in all tenures and it could be argued have most to gain from strategies that prioritise investment in improving Welsh housing generally.

2. This Association therefore recommends that the Committee's examination of older people's housing needs should be located within the overall policy framework for improving Welsh housing created by the Assembly government since devolution, as well as focusing on the more strategic and specialised approach to older people's needs included within the Older People's Strategy. In this context, we would ask that the Committee's review pays particular attention to and scrutinises progress in meeting the following existing Assembly Government policy commitments:

- ***Better Homes for People in Wales*** published in 2001 aimed to give:

"Everyone in Wales the opportunity to live in good quality, affordable housing; to be able to choose where they live and decide whether buying or renting is best for them and their families"

- One of the five key aims of the ***Older People's Strategy***, published last January: "*to promote the provision of high quality services and support which enable older people to live as independently as possible in a suitable and safe environment and ensure services are organised around and responsive to their needs*" is backed by strategic objectives to:
 - Promote an adequate supply of special forms of housing which meet the varying and changing needs of older people and ensure they can remain independent as long as possible and
 - Ensure older people have access to the help they need to remain in their own homes.
 - Most recently the "***Wanless***" ***review team's report on the future of health and social care*** in Wales, recommended "a strategic readjustment of services to focus them on prevention and early intervention" which has been endorsed by the Assembly government. Although the Review focuses primarily on NHS and social services, the

Chief Medical Officer's 201/2 report and other Assembly publications demonstrates how prevention and action to tackle poor housing conditions are particularly relevant in impacting not only on older people's health but also on health inequalities and demands for both NHS and social services.

Principles to underpin the debate

1. The development of the attached report, "*The Future of Sheltered Housing*" was coordinated by this Association but, as the Committee will note from the introduction, the main national housing organisations and organisations representing older people's interests, contributed to and have endorsed its contents and recommendations. The report was produced to inform the deliberations of the Older People's Strategy Advisory Group in 2002. It was later that the year submitted for consideration to the Assembly's Local government and Housing Committee and to the Partnership Council. We thought it useful to resubmit this evidence in relation to the Committee's current inquiry because most of the findings and recommendations remain as relevant to today's debate as they were in 2002.
2. The original reason for producing the report was to generate a debate on the future of sheltered housing, because its important role appeared to be being overlooked or downplayed. However, it became obvious from our group discussions that it makes no sense to consider the future of sheltered housing in isolation from other options for meeting older people's housing needs. Our conclusion, which we hope will inform the Committee's current considerations, was that the priority should be to examine all options and investment choices that could maximise the contribution of housing to:
 - Improving older people's health and well being;
 - reducing the risk of hospitalisation or needs for longer term support or care; and
 - increasing their participation and reducing the risk of social exclusion, too often associated with ageing

and that the future of sheltered housing should be evaluated in this context.

1. In particular, we argued in paragraph 19 of that report that any national debate should start from the principles that housing options for older people must:
 - Be flexible enough to promote independence, choice and privacy while offering the support, care and sense of security which older people need
 - Shift the emphasis of public policy towards investment that aims to enhance older

people's lives and not just to protect them from risk

- Treat older people as a valuable resource
- Contribute towards a reduction in inequality and social exclusion amongst older people
- Respect and promote older people's rights to maintain their cultural and religious identity and practices and allow them to retain as many of their possessions, previous lifestyle and social life as possible, particularly when they move into accommodation that offers support services
- Contribute to promoting healthy, active and enriched lives for older people designed to increase their participation and ability to play an active part in their local community, rather than isolating them that community
- Be designed to increase their participation in the running and management of the facilities and services provided as part of their housing package
- Increase individual tenant's choice about which elements of a tenancy package to accept, particularly when this includes care and support
- Be relevant to those who are approaching pension age and must not be focused exclusively on the needs and aspirations of those aged over 60 or wait until they have care needs

Progress since 2002

1. There is now a much better framework from which to evaluate older people's needs and determine future priorities than when our report on sheltered housing was drafted in 2001. The Assembly government has invested significantly in research to identify demand and unmet need for different types of dwellings; map existing supply and use of adapted housing in all tenures together with accommodation based care and support or peripatetic support designed to promote independence and to research rural housing markets. This should provide the Assembly with a much stronger evidence base for determining future priorities.
2. In addition, new social housing must now be built to Lifetime Homes Standards and meet the Association of Chief Police Officers' (ACPO) Secured by Design standards and the Welsh Housing Quality Standard aims to bring housing in all tenures up to a reasonable standard. These improvements, once implemented, will contribute in the longer term to allowing older people to stay put as disability increases and also improving safety in the home and reducing the fear of crime. In the shorter term, there

has been additional investment by both the National Assembly and local government to improve home safety, energy efficiency and quality of life as well as to reduce the risk of hospital admissions for many older people including:

- An expansion of the Home Energy Efficiency Scheme for households with a resident over 60 towards meeting the target in *Better Wales* of providing Home Energy Efficiency Scheme to 38,000 households by 2003
 - Increased investment by both National Assembly and local government in Care and Repair Schemes, including the handyman schemes
 - The creation of Rapid Response Adaptations Schemes to facilitate early hospital discharge
 - Developing new forms of "extra care" social housing as alternatives to nursing home care
1. The Assembly has also invested in developing policies and new statutory requirements, that seek to redress disadvantage by groups facing discrimination, including black and minority ethnic communities and other barriers to decent housing which should benefit older people as much as other tenants and owner occupiers.

Challenges and priorities for future action and investment

2. No-one should underestimate the scale of the challenge resulting from decades of under-investment in decent, affordable housing in Wales coupled with high levels of poverty and deprivation. Housing conditions in parts of Wales remain amongst the worst in the United Kingdom with over a third of homes built before 1919 and much of the poorest housing is occupied by pensioners.
3. Paragraph 20 of our 2002 report made the point that the publication of the Assembly's housing framework and strategy, together with the strategy for older people in Wales, have raised expectations that a wider range of options will become available promoting more choices and improving well-being, rights and independence as we age. We recognise the limitations on how much the Welsh Assembly Government can do when so much of housing finance policy and the level of resources available for housing in Wales continue to be determined by the Westminster government and the additional investment outlined above is very welcome. However, this Association remains of the view that the priority given by the Assembly Government to housing investment has simply not been sufficient since devolution to make a significant impact on older people's housing conditions or their access to appropriate, affordable housing. In 2002 we argued that the national framework could be no more than aspirational unless the

Assembly was prepared to invest far more in housing renewal, repair and support services than it has done since devolution, and we believe this is still the case.

4. The Committee will note the case made in our 2003 pre-election Housing Manifesto for greater investment in housing in all sectors by this new government. We remain of the view that this new Assembly government should afford the same priority to housing investment as that given to health and education by the first administration. For the reasons given in paragraph 4, investment in improving housing conditions across Wales and increasing the range and availability of different kinds of housing, including quality, affordable rented housing, is likely to have the greatest impact on older people's choices, their chances of appropriate and decent housing and their ability to maintain health, independence and quality of life as they get older.
5. Greater investment in improving older people's housing conditions, as *Better Homes* recognised, would contribute towards many of the Assembly's key objectives, not least, promoting social inclusion, tackling inequality, promoting independence and reducing pressures on the health service. The challenges in meeting the Welsh Housing Quality Standards when most older people are owner occupiers, often living in very poor housing conditions cannot be underestimated and should be given a high priority for action and investment. Below, taking account of the specific issues which are the subject of this policy review, are other priorities and intractable challenges which local government believes should be immediate priorities for innovation and additional investment, over and above that which has already been made since devolution, if we are to improve older people's chances of decent, affordable and appropriate housing.

Private sector renewal

6. We start with private sector renewal because this is where most pensioners live and where there are some of the worst housing conditions with, 7.6% of owner occupied housing and 18.4% of privately rented homes classed as unfit in 1998. The Assembly government has been exploring innovative ways of funding private sector renewal. Private sector finance does have a role to play, but given the poor state of private sector housing and the relatively low incomes of many private sector tenants and owner occupiers in Wales, it is difficult to see how significant levels of private sector renewal can be achieved without additional public investment as well. Much has been made about the rise in average pensioner incomes but it is important in this context to remember that 43% of single pensioner households had a gross household income of less than £4,000 in 1998. These households will have benefited from the introduction of the minimum income guarantee and most recently, the introduction of the pensioner tax credit, but they will still be on very low incomes and are likely to be amongst the oldest and most vulnerable pensioners living in some of the worst housing conditions.

7. The Association remains particularly sceptical of the capacity of equity release schemes to make a significant difference in many parts of Wales. We do not have the technical expertise to comment on the feasibility of different models but the low property values of much of the worst owner occupied housing would appear to make equity release either fraught or impractical. The growing evidence from Citizens Advice, the Consumer Association and older people's organisations of the problems facing many pensioners who have taken out equity release in recent years is also worrying. Presumably the risks would be higher for future pensioners if interest rates were to rise or property prices fall, as is increasingly predicted. We hope the Committee will look carefully at the evidence and whether adequate safeguards are possible in its consideration of a working equity release model for Wales

8. Local authorities want to make their full contribution to improving private sector conditions and reducing the number of unfit homes and those in serious disrepair. However, while we supported in principle the target in the Assembly's strategic plan, *Better Wales*, to halve the number of homes in serious disrepair by 2010, local authorities warned that it would take 20 years to meet this target, given the level of resources for housing renewal available in 2000. Local authorities have welcomed the new renewal grant system because it gives them much needed flexibility to target resources in response to local needs and priorities. But authorities have been given little additional funding to be able to increase the overall budget available for renewal in their area. In parts of Wales, private sector housing is deteriorating at a rate which means that, at best, renewal programmes may only be achieving a standstill in terms of unfitness and disrepair. Disabled Facilities Grants play an important part in enabling many disabled people to have essential work done to their homes but the scheme has serious shortcomings which it would be useful for the Committee to examine. In particular, the Committee should look at how many older owner occupiers continue to have difficulty raising the contribution towards the work which they are assessed as having to pay under the means-test and how often this results in the work not being undertaken.

Contributing to social inclusion and increasing participation

9. Housing options and housing related services can make a major impact on reducing the inequalities experienced by and between older people and ameliorating the consequences of inequality and poverty on their housing conditions. For instance, older people are more at risk of fuel poverty than most of the rest of the population and more likely to live in less energy efficient homes. They are also more likely to depend on sources of heating and other appliances that are less safe as well as inefficient. Investment in the HEES scheme referred to earlier therefore is helping to reduce fuel poverty and the risk of hypothermia and ill health. Although investment has increased in the past two years, much more is needed if the Assembly is to reach its target of eliminating fuel poverty by 2010. It would be particularly helpful if the Committee could

shed light on the different reasons why it proves difficult to target HEES effectively at older households and ways to tackle these problem. It does appear that part of the reason is due to eligibility being linked to means-tested benefits, when some fuel poor households have incomes just above the thresholds and other pensioners are not prepared to submit to means-tests

10. A central theme running through our 2002 report is that housing options for older people must go beyond purely bricks and mortar considerations. Even when older people are relatively affluent and well housed, "maintaining independence" is often at the expense of social isolation and only being offered alternatives when nursing care is the only realistic option. The aims of the Older People's Strategy in promoting active citizenship and healthy, active and enriched lives for older people can only be achieved if there is the right infrastructure and support, including transport and social interaction, in addition to an appropriate range of decent quality housing,. Provision of the right housing and infrastructure can make a major contribute to increasing older people's ability to play an active part in their local community, rather than isolating them in that community. Our 2002 report also provides graphic examples of the extent to which older people are forced to give up essential aspects of their social and cultural identify when contemplating a move to more supported accommodation because of ill health or disability and future policies and investment strategies for supported housing must address these problems.

Rural needs

11. There are considerable challenges in considering the right approach to investment in bricks and mortar appropriate to meeting the needs of older people in rural areas. Some of the issues relating to supported housing in rural areas are summarised in our 2002 report. That report also indicates that the points above about the importance of getting the right infrastructure and support linked to housing options and building inter-generational links are probably crucial in relation to rural needs. Representatives from older people's organisations strenuously emphasised in our discussions in the Older People's Advisory Group, the importance of investment in community facilities in rural areas as the key to promoting active citizenship and maintaining independence for older people. Any review of older people's housing needs should not overlook the part which greater investment in maintaining and developing community facilities in villages can achieve in developing and maintaining the kind of mutual support and range of activities which create the demand for retirement "complexes" such as Berry Hill . Where such facilities and support, including regular social activity, traditionally provided through churches, chapels and the Women's Institute, exist in villages, many older people are enabled to stay in their own homes and lead reasonably active lives In this context, increasing older people's access to public buildings and other facilities, such as schools and IT training, not only provides them with meeting spaces and skill development but can break down social isolation and build inter-generational learning and relationships to

the benefit of the whole community.

Housing and Health

12. The links between housing and health have become much better understood and acknowledged in recent years. Better Homes recognised the contribution which decent, safe, warm and affordable housing makes to improving health and quality of life in Wales. More recently, it has been estimated that the NHS spends £50 million a year as a result of illnesses and accidents caused by poor housing conditions. It seems likely that many older people stay longer in hospital than they need to or have to be transferred to residential or nursing care because their housing circumstances do not permit them to go home. However, we are not aware of any specific research or reliable statistics about this. The Committee might therefore consider recommending that research is undertaken to identify how often housing circumstances, rather than purely care needs, contribute to delayed discharges or "continuing care" requirements and what the potential cost-benefit might be for older people, social services and the NHS from greater investment in their housing circumstances to permit more of them to go home immediately after acute hospital admissions.
13. Since devolution, this Association has consistently made the case for a much greater emphasis on "spend to save" in the allocation of NHS budgets and the value from some NHS funding being transferred to increase local government's capacity to tackle directly the determinants of ill health and health inequalities and thereby reducing demands for expensive NHS services. Our case is supported by the "Townsend" Review of distribution of NHS resources which made the point that there is only so much that can be achieved by redistributing resources within the NHS and that other investment is also required to overcome the causes of poverty and health inequality directly. In this context, action to improve older people's housing circumstances should be a high priority for investment not only because of the impact on their health and well-being and on health inequalities but also because of the potential savings on prescription budgets and expensive, acute NHS care and treatment in both primary and secondary settings.
14. In this context, the Committee is right to focus on the new Local Health Boards' role in investing more in housing services. From the discussions between Local Authority Leaders and LHB Chairs, this Association is confident that the new LHBs understand and welcome their new preventative responsibilities and will build on the precedents set by some of their predecessor Local Health Groups (LHGs). Several LHGs, in recognition of the impact of older people's housing conditions on both prescribing budgets and hospital admissions had been funding housing services, such as Care and Repair for some time. As we seek to demonstrate below, the new health and well-being strategies also have a crucial part to play in delivering a more holistic approach to invest across local government and the NHS.

15. While this Association strongly endorsed the then Finance Minister's decision to commission a Review in Wales that covered social care as well as the NHS, we also, in our evidence to the Review, made the case for housing services also being included. We argued that a truly whole systems approach to the capacity issues affecting the NHS could not separate older people's housing needs and housing conditions from the issues affecting health and social services.
16. This Association endorses the priority that should be given to solving the capacity problems in health and social care and achieving more effective use of existing resources. We also accept the assurances from Ministers that the Assembly government is signed up to the kind of whole systems approach being advocated by local government. However, we continue to be concerned that the "Wanless " review is resulting, in practice, on an increasing focus primarily on the short term issues affecting health and social care services and this may be deflecting attention away from the links with housing circumstances and the need to investment more in the short term in preventative and lower level interventions in relation to older people. We very much hope that the Committee's Policy Review can help to redress this balance and ensure an equal focus on tackling housing conditions and improving housing options as part of the strategy to implement the "Wanless" recommendations.

Health, social care and wellbeing strategies

17. The new statutory duty on both local authorities and local health boards under Section 24 of 2002 Health Act "jointly to formulate and implement a strategy for the health and well-being for members of the public in the local authority's area" provides a radical new mechanism bringing together both local government and the NHS to plan and invest in meeting local needs and to shift investment towards more preventative intervention. It is disappointing therefore that the "Wanless" Review in Wales paid so little attention to the potential of these strategies in realising the Review Team's aims when his new duty provides the framework for a truly joint "whole systems" approach to service planning and a local joint investment strategy between local government and the NHS. Both the Regulations and Guidance emphasise that the scope of these strategies goes well beyond health and social care and is intended to "

"span the whole spectrum from preventative action and regulation to improve health and reduce the risk of ill health through to care services... It will reflect the need to tackle the underlying causes of ill health, for example, poor housing, poor education, substance misuse, community safety and unemployment" (Health and Well Being Strategy Guidance 2001)

18. It is clear from the scope of these strategies as outlined in the Guidance, that other Assembly Committees, in addition to the Health and Social Services Committee, have a direct interest in ensuring that the full potential from these strategies in delivering the intended holistic and balanced approach to planning and investment across all local

government and NHS services is harnessed. Individual subject committees, will want to be assured that the issues that come within their remit, such as housing and social inclusion, are being effectively addressed through the development of local health and wellbeing strategies,

19. In addition, these new arrangements will take time to become effective. Both local authorities and LHBs require considerable support and investment in skills and organisational development to deliver these new joint responsibilities for health and wellbeing. The will is there locally but time, training and adequate support are required to develop effective working relationship and sufficient confidence and trust to become capable of discharging the new responsibilities effectively and delivering a whole systems approach. It is essential therefore that, having just completed its NHS reforms, the Assembly government should maintain the courage of its convictions and support these new arrangements and frameworks.
20. Local government is convinced that the health and wellbeing strategies hold the key to getting the balance of investment right and achieving more preventative and sustainable solutions to older people's needs. But this will only be possible unless the whole Assembly is prepared to back their development, and has the stamina to allow them to mature and prove what they are capable, rather than seeking yet more new, short term strategies to deal with immediate challenges. Cross Party, long term conviction is required not only to tackle the short term pressures on acute NHS services identified in the Wanless report, but also to sustain investment in building capacity and preventative solutions, including better housing options, if older people are to be able to maintain independence and higher quality of life in the future and the capacity problems in the NHS are not to re-emerge.
21. Subject Committee's such as the Social Justice Committee have a critical role to play in ensuring this happens and there is a greater focus on prevention as a result of the health and wellbeing strategies, including undertaking more joint policy reviews on "cross cutting issues" such as older people's needs for housing and support. . All subject Committees will also want to monitor the extent to which Assembly government's policies and investment priorities are adequately supporting strategy development and tackling the considerable challenges and obstacles, outlined below, which currently limit how much either LHBs or local authorities can do to build a more holistic and preventative approach to meeting older people's needs, including accommodation and support.

Early intervention and prevention

22. The fact that local Authority Leaders and LHB Chairs began to establish a close working relationship both locally and nationally shortly after the health reforms came on stream demonstrates how much they understand the importance of and potential from these new joint leadership responsibilities. There is a commitment on both sides to shift investment to harness the range of local government interventions, such as, housing, transport and leisure services which reduce health hazards and provide cost effective

solutions to assist individuals to sustain their independence, quality of life and maintain or improve health following ill health or trauma. However, there are considerable challenges in realising these objectives.

23. Shifting the balance of provision and investment in both local government and the NHS is difficult when older people's needs for care outstrip the available resources; care costs continue to rise well above inflation; there continue to be significant deficits in the NHS; and the NHS (SSAF) targets require priority to be given to investment which tackles the pressures on acute NHS services.
24. The majority of the Assembly's increased investment in older people since devolution has been primarily focused on treatment and care services provided by the NHS or social services. One of the objectives from this Policy Review could be to provide practical and innovative suggestions for both national and local investment priorities in order to tackle older people's housing conditions and give them more housing choices and chances of leading active lives as they get older. One way in which the Assembly government could take the lead would be to demonstrably redress the balance in next year's budget priorities and its policy priorities by investing far more in prevention and early intervention, including investment to improve housing conditions and housing options for older people.

Supported housing

25. While much of this submission has focused on older people's general housing needs, as the Older People's strategy demonstrates, it is equally important that more specialist housing is available for those older people who need more care and support. Most of the issues in relation to supported housing and priorities for action which we would wish to draw to the Committee's attention are included in our 2002 report. We would, however, wish to highlight the risk that recent debates about meeting older people's needs become polarised between, on the one hand, a focus on allowing them "to stay put" for as long as possible and on the other focusing investment in schemes and services that cater for those with high care needs.
26. One of the reasons we wrote the 2002 report was because older people with the financial means seemed to make more informed and complex choices when faced with ageing. Many of these older people recognise the need to move on to more suitable housing while they are still fit and well enough to do so fairly easily and able to develop and enjoy their new way of life. It is therefore essential that government policy should not equate "maintaining independence" with "staying put" in the home that was right for you when you were 30 and had 3 children but which may not be either the right building nor provide the right social support when you are getting older or if you become less able. The crux of our 2002 report is that strategies to maintain independence should

give all older people a much wider and flexible range of options than at present – and certainly offer opportunities to "downsize" or move closer to friends and relatives before they become ill or in need of care services. Our housing options in older age should be as much about meeting our needs for an active life and social support as with the bricks and mortar. We hope that the outcome of the Committee's Policy Review will therefore shed light on how we can invest in better housing for older people which allows them to choose the right time to stay put or to move to more appropriate housing smoothly and easily in a planned and considered way, without decisions nearly always having to be taken following a crisis when options may be very limited.

27. Extra care housing has an important role to play in assisting those with high care needs to remain in the community and there remains much unmet need for such provision. The Association would recommend that further investment in extra care housing should be a priority for the future. However, as our 2002 report suggests, the fact that there is an important new role for extra care housing should not be taken as an indication that there is no need for additional investment in other supported housing which provides much lower levels of intervention and support, when so much specialist older people's housing provided by local authorities, registered social landlords and the private sector seems as popular as ever.
28. We hope that the Assembly's research will have shed light on why some of the more traditional forms of sheltered housing appear to have become unpopular in some areas and what models are now appropriate and acceptable for older people who want to make a transition from "staying put" into some middle ground which sheltered housing and retirement complexes seem to offer. Whatever models of specialist housing, including those capable of meeting high care needs, are maintained or developed in the future, it is essential that ways are found to safeguard older people's independence, social and cultural identities. The most important thing is that moving on to more supported housing should become more associated with having a new and fulfilling phase of one's life rather than synonymous with having to give up so much of our previous way of life and what we value as integral to your identity and place in the world

Supporting People

29. This review should not overlook how the provision and funding of supported housing for older people, including traditional sheltered housing, has been affected by the introduction of Supporting People into Wales in April. As existing tenants are protected under the transitional arrangements, it may be too early for the Committee to judge as part of this Policy Review either short or longer term implications for older people's supported housing resulting from these changes.
30. We would however suggest that evidence collection and monitoring the impact of

Supporting People –both its implementation and likely impact on future developments – on older people’s housing options should be an on-going priority for the Committee. In the lead up to implementation of Supporting People, the Assembly was lobbied heavily by interest groups representing homeless people and younger people in need of specialist housing. As a result, a great deal of consideration was given to how these types of accommodation would be affected and steps taken to protect the position of these younger tenants and to encourage housing providers to continue to develop schemes. For whatever reason, far less attention was given to the impact of Supporting People on supported housing for older people and therefore deserves more scrutiny now.

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